Billing Entries Siancas v. Rallye Motors, LLC

Date	User	Description	Rate	Time	Total
7/11/2024	Steven John Moser	Motion for approval of settlement	\$450.00	2.8	\$1,260.00
7/10/2024	Shirley Navarro-Losito	Sent settlement and damages calculation to clients for their signature	\$100.00	0.3	\$30.00
7/9/2024	Steven John Moser	Revise settlement agreement	\$450.00	8.0	\$360.00
7/9/2024	Shirley Navarro-Losito	Call to all clients	\$100.00	0.4	\$40.00
6/28/2024	Shirley Navarro-Losito	Research Re: cheeks motion	\$100.00	0.3	\$30.00
6/24/2024	Shirley Navarro-Losito	Review Court Docket	\$100.00	0.2	\$20.00
6/18/2024	Shirley Navarro-Losito	Telephone call with Billy Odria	\$100.00	0.2	\$20.00
5/20/2024	Steven John Moser	Telephone call to Edilberto Munguia-Ortiz.	\$450.00	0.2	\$90.00
5/20/2024	Steven John Moser	Text messages from SJM to Edilberto Munguia Ortiz	\$450.00	0.2	\$90.00
5/20/2024	Steven John Moser	Status conference prep and telephonic attendance	\$450.00	0.3	\$135.00
5/20/2024	Steven John Moser	Email to McGrath	\$450.00	0.2	\$90.00
5/20/2024	Steven John Moser	In-person meeting with Edilberto Munguia Ortiz in Roslyn, NY, includes travel	\$450.00	2.5	\$1,125.00
5/8/2024	Steven John Moser	Court conference re motion to withdraw as attorney for Maldonado. Includes	\$450.00	2	\$900.00
5/8/2024	Shirley Navarro-Losito	Printed minute order from Judge and prepared certificate of svce by mail to O.			
		Maldonado. Sent via mail and filed proof via ECF	\$100.00	0.3	\$30.00
4/30/2024	Shirley Navarro-Losito	Client Jose Rivera and Billy called to ask about the status of the case.	\$100.00	0.3	\$30.00
4/15/2024	Shirley Navarro-Losito	Prepared Cert of Svce by mail and sent to O. Maldonado. also filed via ECF	\$100.00	0.3	\$30.00
4/12/2024	Shirley Navarro-Losito	Telephone call to Raul Siancas	\$100.00	0.3	\$30.00
3/29/2024	Shirley Navarro-Losito	Drafted ltr to Judge Locke re: proposal dates for oral argument and filed via ECF	\$100.00	0.3	\$30.00
3/26/2024	Shirley Navarro-Losito	Prepared certificate of Svce by mail to send Motion to WD as counsel to Orlin			
		Maldonado at last known address in Detroit	\$100.00	0.4	\$40.00
3/26/2024	Shirley Navarro-Losito	Call with Siancas	\$100.00	0.2	\$20.00
3/25/2024	Shirley Navarro-Losito	Re-filed motion to Withdraw as attny for Maldonado	\$100.00	0.2	\$20.00
3/8/2024	Shirley Navarro-Losito	Telephone call from Billy Odria	\$100.00	0.3	\$30.00
2/26/2024	Shirley Navarro-Losito	Raul Siancas called, wanted to know update of the settlement.	\$100.00	0.2	\$20.00
2/20/2024	Steven John Moser	Prepare first draft of motion	\$450.00	0.5	\$225.00
2/20/2024	Steven John Moser	Email regarding anticipated motion to withdraw as counsel for orlin maldonado	\$450.00	0.2	\$90.00
2/16/2024	Shirley Navarro-Losito	Sent text message to Edilberto	\$100.00	0.2	\$20.00
2/13/2024	Steven John Moser	Review file to prepare settlement paperwork	\$450.00	0.5	\$225.00

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Date	User	Description	Rate	Time	Total
2/13/2024	Steven John Moser	Revise settlement agreement and proposed distribution of settlement funds	\$450.00	1	\$450.00
2/13/2024	Steven John Moser	Online research re Michael Agolia and Lisa Agolia (PACER, Lexis, Google)	\$450.00	0.5	\$225.00
2/13/2024	Shirley Navarro-Losito	Called E Munguia	\$100.00	0.3	\$30.00
2/8/2024	Steven John Moser	Draft letter extending time to file cheeks motion from Feb 9, 2024 until Feb 23,			_
		2024 and email to Jim McGrath	\$450.00	0.3	\$135.00
2/8/2024	Steven John Moser	File letter motion to xtend time to file cheeks motion from 2/9/2024 until	\$450.00	0.2	\$90.00
2/2/2024	Steven John Moser	Telephone call with Rossebel Lobo Rivera	\$450.00	0.2	\$90.00
2/2/2024	Shirley Navarro-Losito	Spoke to Orlin Banegas Maldonado. See note	\$100.00	0.2	\$20.00
2/2/2024	Shirley Navarro-Losito	Call with Billy about the case.	\$100.00	0.3	\$30.00
2/2/2024	Shirley Navarro-Losito	Prepared Consent to trial by Magistrate and sent over to attys for their signature	\$100.00	0.3	\$30.00
2/2/2024	Shirley Navarro-Losito	Filed Consent to Jurisdiction by Magistrate via ECF	\$100.00	0.2	\$20.00
2/1/2024	Shirley Navarro-Losito	Call with Rossebel Lobo (see notes)	\$100.00	0.3	\$30.00
1/26/2024	Shirley Navarro-Losito	Call with Raul Siancas, wanted updates on the case and status of the	\$100.00	0.4	\$40.00
1/24/2024	Shirley Navarro-Losito	Created Letter to client (unable to reach) in spanish and uploaded as a	\$100.00	0.6	\$60.00
1/24/2024	Shirley Navarro-Losito	Prepared letters to be mailed to clients who we are unable to reach at address	\$100.00	0.8	\$80.00
1/23/2024	Steven John Moser	Phone call with Edilberto Munguia Ortiz	\$450.00	0.1	\$45.00
12/18/2023	Shirley Navarro-Losito	spoke to clients to give them the zoom information for the meeting	\$100.00	0.2	\$20.00
12/18/2023	Shirley Navarro-Losito	Telephone call from R. Siancas	\$100.00	0.2	\$20.00
12/14/2023	Steven John Moser	Meetings with Billy Odria, Raul Siancas, Rossebel Lobo Rivera, and Jose Rapalo	\$450.00	2.1	\$945.00
12/14/2023	Shirley Navarro-Losito	Call with Raul about the zoom mediation on monday 12/18	\$100.00	0.2	\$20.00
12/12/2023	Steven John Moser	Revise damages computations	\$450.00	0.3	\$135.00
12/8/2023	Steven John Moser	Review file to prepare ex-parte mediation statement	\$450.00	2.2	\$990.00
12/8/2023	Steven John Moser	Prepare ex-parte mediation settlement damages calculations	\$450.00	1.9	\$855.00
12/8/2023	Steven John Moser	Prepare and email Plaintiffs' ex-parte settlement statment to Ira Cure	\$450.00	3.9	\$1,755.00
11/16/2023	Shirley Navarro-Losito	called all the clients to let them know the mediation is coming and they need to	\$100.00	0.4	\$40.00
11/9/2023	Steven John Moser	Siancas: Call with Raul Siancas	\$450.00	0.5	\$225.00
11/9/2023	Steven John Moser	Telephone call to Raul Siancas	\$450.00	0.2	\$90.00
11/9/2023	Shirley Navarro-Losito	Call with Siancas abut the upcoming Mediation and set up conference call with	\$100.00	0.5	\$50.00
10/30/2023	Shirley Navarro-Losito	Reviewing mediation dates and other deadlines and adding them to the	\$100.00	0.3	\$30.00

Billing Entries Siancas v. Rallye Motors, LLC

Date	User	Description	Rate	Time	Total
10/30/2023	Shirley Navarro-Losito	Prepared check and added expense to the case for mediation. Sent check via	\$100.00	0.4	\$40.00
10/26/2023	Steven John Moser	Email to Jim McGrath re mediation	\$450.00	0.2	\$90.00
10/25/2023	Steven John Moser	Draft proposed letter re mediation and send to opposing counsel for review.	\$450.00	0.5	\$225.00
10/25/2023	Steven John Moser	Draft revisions to letter and send to J McGrath for review	\$450.00	0.3	\$135.00
10/23/2023	Steven John Moser	Call with James McGrath	\$450.00	0.3	\$135.00
6/13/2023	Shirley Navarro-Losito	Reviewed court docket	\$100.00	0.3	\$30.00
6/1/2023	Shirley Navarro-Losito	Phone call with Raul Siancas	\$100.00	0.2	\$20.00
6/1/2023	Shirley Navarro-Losito	Phone call with Billy Joel Odria	\$100.00	0.2	\$20.00
6/1/2023	Shirley Navarro-Losito	Phone call with Edilberto Munguia Ortiz	\$100.00	0.3	\$30.00
6/1/2023	Shirley Navarro-Losito	Phone call with Jose Alexander Rivera Rapalo	\$100.00	0.3	\$30.00
5/31/2023	Steven John Moser	Review file and assign tasks to SNL to contact all existing clients	\$450.00	0.6	\$270.00
4/3/2023	Shirley Navarro-Losito	Reviewed court docket	\$100.00	0.3	\$30.00
1/12/2023	Steven John Moser	Routine file review	\$450.00	0.2	\$90.00
12/6/2022	Shirley Navarro-Losito	Reviewed court docket and answer to complain from defendants	\$100.00	0.3	\$30.00
11/14/2022	Shirley Navarro-Losito	upload 1st Amended Complaint and file via ECF	\$100.00	0.3	\$30.00
10/12/2022	Shirley Navarro-Losito	Reviewed court docket	\$100.00	0.2	\$20.00
9/9/2022	Shirley Navarro-Losito	call with client to get updated info for other clients	\$100.00	0.2	\$20.00
9/9/2022	Shirley Navarro-Losito	Call with Clients to update their information and acquire other guys info	\$100.00	0.3	\$30.00
9/2/2022	Steven John Moser	Email from J. McGrath responding to settlement offer	\$450.00	0.2	\$90.00
9/2/2022	Steven John Moser	Email to J. McGrath	\$450.00	0.3	\$135.00
9/1/2022	Shirley Navarro-Losito	call with Billy Odria updating information and giving case update	\$100.00	0.3	\$30.00
8/29/2022	Shirley Navarro-Losito	Review Court docket- SNL	\$100.00	0.2	\$20.00
8/26/2022	Steven John Moser	Review file	\$450.00	0.5	\$225.00
8/26/2022	Steven John Moser	Revise damages calculations and email to opposing counsel	\$450.00	1.2	\$540.00
8/26/2022	Steven John Moser	Email J McGrath	\$450.00	0.2	\$90.00
8/26/2022	Shirley Navarro-Losito	Call to clients to update their information and data entry	\$100.00	0.4	\$40.00
8/19/2022	Shirley Navarro-Losito	Called all clients to update their information in the system	\$100.00	0.2	\$20.00
8/19/2022	Shirley Navarro-Losito	Call with Edilberto	\$100.00	0.2	\$20.00
8/19/2022	Shirley Navarro-Losito	Input all information from clients into system from Clio	\$100.00	0.3	\$30.00

Billing Entries Siancas v. Rallye Motors, LLC

Date	User	Description	Rate	Time	Total
8/16/2022	Steven John Moser	Review file	\$450.00	0.6	\$270.00
8/16/2022	Steven John Moser	Import all case files from NetDocuments	\$450.00	0.5	\$225.00
4/1/2022	Steven John Moser	Review Rallye Letter to SIL requesting that reply be disregarded	\$450.00	0.2	\$90.00
4/1/2022	Steven John Moser	Prepare letter in response to Rally's Request that Pl's reply be disregarded	\$450.00	0.5	\$225.00
4/1/2022	Steven John Moser	File Letter to SIL via ECF	\$450.00	0.1	\$45.00
3/25/2022	Steven John Moser	Legal research for Reply ISO motion to amend	\$450.00	2.1	\$945.00
3/25/2022	Steven John Moser	Draft Reply MOL ISO Motion to Amend	\$450.00	2.8	\$1,260.00
3/25/2022	Steven John Moser	Bundle File all Motion papers re Mot to Amend	\$450.00	0.2	\$90.00
3/1/2022	Steven John Moser	Revise NOM, MOL and FAC re amendment of complaint	\$450.00	1.2	\$540.00
2/28/2022	Steven John Moser	Review file and docket sheet	\$450.00	0.2	\$90.00
2/28/2022	Steven John Moser	Review file and court docket	\$450.00	0.3	\$135.00
9/8/2021	Steven John Moser	Telephone call from SJM to Raul Siancas	\$450.00	0.2	\$90.00
8/12/2021	Steven John Moser	Review bankruptcy dockets for Exclusive and Michael Agolia	\$450.00	1.2	\$540.00
8/12/2021	Steven John Moser	Prepare motion to dismiss claims against Exclusive without prejudice	\$450.00	1.5	\$675.00
8/12/2021	Steven John Moser	Revise MOL in support of motion to amend complaint	\$450.00	2.3	\$1,035.00
8/12/2021	Steven John Moser	Review and revise proposed First Amended Complaint	\$450.00	2.3	\$1,035.00
2/9/2021	Steven John Moser	Review docket sheet to update opt-in contact information and verify that			_
		damages calculations include all opt-ins.	\$450.00	0.5	\$225.00
2/9/2021	Steven John Moser	Revise damages calculations and email to opposing counsel with Settlement	\$450.00	0.8	\$360.00
2/9/2021	Shirley Navarro-Losito	Telephone Call from JS to Siancas re Case Update	\$100.00	0.1	\$10.00
2/9/2021	Shirley Navarro-Losito	VM from JS to Orlin Maldonado re Case Update	\$100.00	0.1	\$10.00
2/9/2021	Shirley Navarro-Losito	Telephone Call from JS to Billy Odria re Case Update	\$100.00	0.1	\$10.00
2/9/2021	Shirley Navarro-Losito	Telephone Call from JS to Edilberto Ortiz re Case Update	\$100.00	0.1	\$10.00
2/9/2021	Shirley Navarro-Losito	VM from JS to Jose Rivera Rapalo re Case Update	\$100.00	0.1	\$10.00
2/9/2021	Shirley Navarro-Losito	Telephone Call from JS to Rossebel Rivera	\$100.00	0.1	\$10.00
2/3/2021	Steven John Moser	Telephone call from S Moser to J McGrath re settlement	\$450.00	0.1	\$45.00
1/26/2021	Steven John Moser	Research status of bankruptcy of Exlcusive Detailing, Inc.	\$450.00	0.3	\$135.00
1/26/2021	Steven John Moser	Prepare and file status report re Status of EDI bankruptcy to Hon. Joanna	\$450.00	0.2	\$90.00
1/26/2021	Steven John Moser	Email to James McGrath regarding setting up a M&C for next week	\$450.00	0.2	\$90.00

Billing Entries Siancas v. Rallye Motors, LLC

Date	User	Description	Rate	Time	Total
12/22/2020	Paralegal	Reviewed ECF Bounceorder staying case by Magistrate Judge SILbased upon			
		the bankruptcy filing. The case may reopen once the bankruptcy issue is	\$100.00	0.1	\$10.00
12/18/2020	Paralegal	Reviewed 12/17/20 JS Status Report Order Received via ECF Bounce	\$100.00	0.1	\$10.00
12/18/2020	Paralegal	Uploaded to NetDocs 12/17/20 JS Status Report Order Received via ECF Bounce	\$100.00	0.1	\$10.00
12/18/2020	Paralegal	Filed in Binder 12/17/20 JS Status Report Order Received via ECF Bounce	\$100.00	0.1	\$10.00
12/18/2020	Paralegal	Calendared in Clio date Plaintiff must file Status Report	\$100.00	0.1	\$10.00
12/10/2020	Steven John Moser	Research status of Bankruptcy case (16-BK-19065) still open	\$450.00	0.3	\$135.00
7/28/2020	Steven John Moser	PACER research into status of bankruptcy proceeding - Exclusive bankruptcy not			
		yet closed - opened in 2016	\$450.00	0.4	\$180.00
1/16/2020	Paralegal	Reviewed Order Staying Case by Steven I. Locke.	\$100.00	0.1	\$10.00
1/16/2020	Paralegal	Uploaded Order Staying Case by Steven I. Locke.	\$100.00	0.1	\$10.00
11/27/2019	Steven John Moser	Review case docket sheet to prepare summary of timeline and status report to	\$450.00	1.7	\$765.00
11/27/2019	Steven John Moser	Pacer case search for Exclusive Detailing Inc's filing information. Case is still	\$450.00	0.4	\$180.00
11/26/2019	Steven John Moser	Telephone call to R Siancas	\$450.00	0.4	\$180.00
11/26/2019	Steven John Moser	Telephone call to R Siancas	\$450.00	0.1	\$45.00
11/26/2019	Steven John Moser	Online pacer research regarding status of Agolia Bankruptcy. Bankruptcy	\$450.00	8.0	\$360.00
2/22/2019	Paralegal	Meeting with SJM Re Status of Case	\$100.00	0.2	\$20.00
2/22/2019	Paralegal	R Siancas called re status of case	\$100.00	0.2	\$20.00
2/22/2019	Paralegal	R Siancas called re status of case	\$100.00	0.1	\$10.00
2/22/2019	Paralegal	Meeting with SJM Re Status of Case	\$100.00	0.1	\$10.00
1/16/2019	Paralegal	Rename and reorganize file	\$100.00	3	\$300.00
10/3/2018	Paralegal	R Siancas called re status of case	\$100.00	0.2	\$20.00
7/11/2018	Paralegal	R Siancas called re status of case	\$100.00	0.2	\$20.00
6/29/2018	Paralegal	Reorganize and rename folders and files	\$100.00	7.6	\$760.00
6/29/2018	Paralegal	Review Wells Fargo response to subpoena	\$100.00	3.9	\$390.00
6/27/2018	Paralegal	Organize file and rename documents	\$100.00	2	\$200.00
6/26/2018	Paralegal	Organize file	\$100.00	1.4	\$140.00
6/22/2018	Paralegal	Organize file	\$100.00	0.5	\$50.00
6/20/2018	Paralegal	Organize file	\$100.00	1.7	\$170.00

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Date	User	Description	Rate	Time	Total
6/13/2018	Paralegal	R Siancas called re status of case	\$100.00	0.1	\$10.00
5/30/2018	Paralegal	R Siancas called re status of case	\$100.00	0.1	\$10.00
1/1/2018	Paralegal	Balance of hours carried forward from PC Law	\$100.00	162.7	\$16,270.00
1/1/2018	Steven John Moser	Balance of hours carried forward from PC Law	\$450.00	202.5	\$91,125.00